

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEBRASKA

JANE DOE 1 and JANE DOE 2,

Plaintiffs,

vs.

BOARD OF REGENTS OF THE  
UNIVERSITY OF NEBRASKA,

Defendant.

Case No. 4:20-cv-03081

**JOINT MOTION  
TO EXTEND DEADLINES**

COME NOW Plaintiffs Jane Doe 1 and Jane Doe 2, and Defendant, by and through their respective undersigned counsel, and request that the following deadlines be extended:

1. Deadline for completing written discovery under Rules 33, 34, 36 and 45 of the Federal Rules of Civil Procedure be extended from October 27, 2023, to **February 29, 2024**. Deadline to file motions to compel written discovery under Rules 33, 34, 36 and 45 be extended from November 28, 2023, to **April 12, 2024**.

2. The deposition deadline, including but not limited to depositions for oral testimony only under Rule 45 be extended from December 15, 2023, to **April 30, 2024**.

3. The deadlines for identifying and providing complete expert disclosures for all experts expected to testify at trial, (both retained experts, (Fed. R. Civ. P. 26(a)(2)(B)), and non-retained experts, (Fed. R. Civ. P. 26(a)(2)(C)), be extended from September 28, 2023, to **February 29, 2024**, for the defendant(s).

4. The deadline for filing motions to dismiss and motions for summary judgment be extended from February 28, 2024, to **July 1, 2024**.

5. The deadline for filing motions to exclude testimony on Daubert and related grounds be extended from April 30, 2024, to **June 1, 2024**.

6. The deadline for filing Brief in Opposition to dispositive motion as provided above in Paragraph 4 is **August 1, 2024**.

7. The parties are working diligently to comply with all of the Court deadlines. The parties have been and continue to be actively engaged in written discovery. In addition, the parties continue to work together to schedule depositions, considering other professional engagements of witnesses, the parties and parties' counsel. The extension of the above deadlines will allow the parties sufficient time to discover the facts at issue in this case. The enlargement of time requested will not cause any undue hardship or prejudice to any party.

WHEREFORE, Plaintiffs and Defendant respectfully request that this Court extend the above deadline as requested herein.

DATED this 27th day of September, 2023.

JANE DOE 1 AND JANE DOE 2, Plaintiffs

By: /s/Karen Truskowski  
Karen Truskowski  
TEMPERANCE LEGAL GROUP, PLLC  
503 Mall Court #131  
Lansing, MI 48912  
(844) 534-2560  
karen@temperancelegallgroup.com

AND

Elizabeth K. Abdnour (P78203)  
ABDNOUR WEIKER LLP  
Attorney for Plaintiff  
500 E. Michigan Ave., Ste. 130  
Lansing, MI 48912  
Phone: (517) 994-1776  
Fax: (614) 417-5081  
liz@education-rights.com

BOARD OF REGENTS OF THE  
UNIVERSITY OF NEBRASKA, Defendant

By: /s/ Lily Amare  
Susan K. Sapp #19121  
Lily Amare #25735  
Cline Williams Wright  
Johnson & Oldfather, L.L.P.  
1900 U.S. Bank Building  
233 South 13<sup>th</sup> Street  
Lincoln, NE 68508  
(402) 474-6900  
ssapp@clinewilliams.com  
lamare@clinewilliams.com

AND

Bren H. Chambers, #23150  
Deputy General Counsel  
University of Nebraska  
3835 Holdrege Street  
Lincoln, NE 68583-0745  
402-472-1201  
bchambers@nebraska.edu

**CERTIFICATE OF SERVICE**

I hereby certify that on September 27, 2023, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all parties in this case.

/s/ Lily Amare  
Lily Amare